

Broadcast-Newspaper Cross-Ownership Rule and the Local Radio Ownership Rule

Unencumbered media opinion-diversity can only be promoted by protecting local and independent media-ownership. Commercial competition can never be a valid standard for "viewer diversity". The very concepts of viewer and opinion diversity have inherent "regional" context-components. In addition, "diversity" itself requires multiplicity: economic, social, and regional. Historically, only through governmental protection have the myriad of viewpoints across this great land found their scion.

CableTV-alternative diversity and its minority ownership may be floundering; however, commonly-owned media's record portends even more disturbing consequences. Websites and minor cable programming remain infantile. Broadcast TV is and will continue as the primary source of news well into the foreseeable future. The growing new and varied sources of information only beg for their own diversity ownership-protection rather than precipitating any existing protection-reduction. Cross-ownership protection reduction cannot rationally be in the public interest.

Media opinion diversity is constitutionally mandated and remains a vital public interest. Media opinion protection has been ethically and judicially entrusted to our governmental regulatory agency. Less regulated, larger conglomerate ownership only serves to stifle our vital diversity and erode the public trust, which your agency is mandated to protect. It is the FCC's duty and responsibility to strengthen rules restricting cross-ownership, rather than weaken the limitations that continue to protect opinion and viewer diversity across America.